

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF
THE DIRECT MARKETING ASSOCIATION, INC.
(DMA/USPS-T4-85(A) & (C), (E) & (F))

The United States Postal Service hereby provides responses to the following interrogatories of the Direct Marketing Association, Inc.: DMA/USPS-T4-85(a), (c), (e) & (f), filed on September 16, 1997. Interrogatories DMA/USPS-T4-63-84, 85(b) & (d) were redirected to the Postal Service.

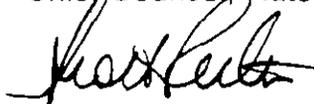
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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September 30, 1997

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF THE DIRECT MARKETING ASSOCIATION**

DMA/USPS-T4-85. Please refer to your direct testimony at page 9, lines 22-26, and to your response to interrogatory NAA/USPS-T4-7.

- (a) What percentage of total routes are in zones possessing 10 or more city routes and/or rural routes with city style addressing?
- (b) What percentage of the total volume of letters do the routes in subpart (a) receive?
- (c) What percentage of total routes are in zones with five to nine routes?
- (d) What percentage of the total volume of letters do the routes in subpart (c) receive?
- (e) What percentage of total routes are represented by the 1,183 zones with fewer than 10 routes that receive DPS as a result of local decisions?
- (f) What percentage of the total volume of letters do the routes in subpart (e) receive?

Response:

- a. The information is forthcoming.
- b. Redirected to the Postal Service.
- c. The information is forthcoming.
- d. Redirected to the Postal Service.
- e. The information is forthcoming.
- f. Since the zones with fewer than ten routes receive DPS as a result of a local decision, I am unable to provide an estimate of the percentage of the total volume of letters that the routes receive.

DECLARATION

I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 9/30/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Scott L. Reiter

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